GIA Environmental Health and Safety Employee Right-To-Know Standard

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ABSTRACT: The purpose of this GIA standard is to define the basic elements and responsibilities of a site chemical Employee Right-To-Know Program.

APPLICABILITY: This GIA standard shall apply to GIA facilities and operations worldwide, except where superseded by more stringent country and/or local regulations.

STATUS: APPROVED 01-Apr-1991; use VTX SMC for current status.

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1 INTRODUCTION

The purpose of this GIA standard is the establishment of an Employee Right-To-Know (R-T-K) Program to ensure that all employees and contractor employees who work with or who are potentially exposed to chemicals are fully informed. The Employee R-T-K Program shall:

- Ensure that chemical hazard information is effectively communicated to those who use and/or may be exposed to chemicals in the workplace
- Establish uniform requirements that ensure all chemicals and chemical products produced, imported, or used are properly evaluated to determine their potential hazards

1.1 SCOPE

This GIA standard shall apply to GIA facilities and operations worldwide, unless superseded by more stringent country and/or local regulations.

1.1.1 Policy

An Employee Right-To-Know (R-T-K) Program shall be established to include and/or address the following:

- Written R-T-K program
- Chemical inventory
- Approval procedure for new and sample chemicals
- Material Safety Data Sheets (MSDSs)
- Labels and other forms of warning
- Employee information and training
- Access to program information
- Workplace notices

1.2 RESPONSIBILITIES

This subhead describes the responsibilities of the persons involved in fulfilling the requirements of this document.

- Site Manager

  Ensure that a site Employee R-T-K Program is developed, implemented, and adhered to.

Ensure that a site R-T-K Coordinator is appointed and provided with adequate support, resources, and time to ensure that appropriate training and other program-related activities are conducted.

- Department Manager/Supervisor

  Understand and ensure full implementation of the site program as it affects employees and contractor employees.

- Employee Right-To-Know Coordinator

  Develop and ensure the implementation of a site R-T-K program with all its elements and participants.

1.3 LANGUAGE REQUIREMENT FOR THIS STANDARD

The details of this GIA standard and all documentation associated with it, such as manuals, training materials, signs, labels, postings, and so forth, must be available in English and the accepted and official local languages.

1.4 DEFINITIONS

Affected employees	All employees and contractor employees who are or may be exposed to hazardous chemicals in their work area.
Article	A manufactured item that is formed to a specific shape or design during manufacture, has end use function(s) dependent in whole or in part upon its shape or design during end use, and does not release or otherwise result in exposure to a hazardous chemical under normal conditions of use.
Chemical	Any element, chemical compound, or mixture of elements and/or compounds. These shall include but not be limited to any of the following, except for those specifically excluded: **Included:** Adhesives, asbestos-containing products (gaskets, seals, gloves), bar stock, chemicals, cleaning compounds, films, flux, fuel, gas, grease, lacquer, laminates, liquid lubricant, metals, mold release, oil, paint, pellet plastic, powders, prepregs, resins, solder paste, solvents, varnish, wax, and radioactive materials **Excluded:** Office supplies unless ordered in bulk, consumer goods brought in for personal use, food stuffs, water, emergency medical oxygen and breathing air, and health services supplies
Contractor employees	Persons performing work under a Digital purchase order, agreement, or contract such as contract workers, service or repair workers, consultants, insurance workers, and cafeteria workers.
Designated representative	Any individual or organization to whom an employee gives written authorization to exercise such employee's rights under this standard.
Employee	A worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies.

Employer	A person engaged in a business where chemicals are used, distributed, or are produced for use or distribution, including a contractor or subcontractor.
Exposure or Exposed	An employee who is subjected to a hazardous chemical in the course of employment, including periodic nonroutine entry into an area, through any route of entry (inhalation, ingestion, skin contact, or absorption, and so forth) and include potential (such as accidental or possible) exposure.
Foreseeable emergency	Any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment, that could result in an uncontrolled release of hazardous chemical into the workplace, or during site evacuation.
Hazardous chemical	Any chemical that poses a physical hazard or a hazard to health. Hazardous chemicals are listed in reference documents such as: Specific country and local regulations, codes, guidelines, and so forth 29 CFR Part 1910, Subpart Z, *Toxic and Hazardous Substances*, Occupational Safety and Health Administration (OSHA), with updates. *Threshold Limit Values (TLVs) for Chemical Substances and Physical Agents in the Work Environment*, American Conference of Governmental Industrial Hygienists (ACGIH), latest edition. U.S. National Toxicology Program (NTP), Annual Reports on Carcinogens, latest edition. International Agency for Research on Cancer (IARC), Monographs, latest edition. Hazardous Products Act, revised status of Canada 1985, C.24 (applicable to suppliers of hazardous products). Inquires should be directed to the GIA (EH&S) manager.
Physical hazard	A chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water reactive.

2 PROGRAM REQUIREMENTS

The Employee Right-To-Know Program shall include the following elements.

2.1 WRITTEN EMPLOYEE RIGHT-TO-KNOW PROGRAM

The Right-To-Know Program must be documented and must be readily available to employees and contractor employees. It must include site-specific program detail.

a. Identify a site R-T-K Coordinator and others with required responsibility to fulfill portions of the site R-T-K Program.

b. Describe how the chemical inventory is conducted. Include the up-to-date list of chemicals in the plant by work area.

c. Describe the method used to approve new and sample chemicals.

d. Describe the process for obtaining, maintaining, and making available MSDSs for any chemical used on-site.

e. Describe the components of the employee and contractor employee training program(s).

f. Describe the methods to be used to communicate newly identified hazard information.

g. Describe the process to ensure that contractor employees are informed of the hazards to which their employees may be exposed, and how they will be protected.

h. Describe the procedures used to inform affected employees about the potential hazards of nonroutine tasks, and how they shall protect themselves.

i. Describe the procedures used to inform affected employees about potential hazards associated with chemicals in pipes, methods for the maintenance or removal of the pipes, and how affected employees shall protect themselves.

2.2 CHEMICAL INVENTORY

The activity detail for a chemical inventory includes the following.

a. Conduct an annual chemical inventory.

b. Obtain, review, and maintain updated and complete MSDSs for all chemicals being used on-site.

c. Relevant hazard information is to be the basis for the site chemical training program.

d. NO CHEMICAL SHALL BE USED AT A DIGITAL FACILITY WITHOUT AN MSDS OR EQUIVALENT INFORMATION BEING OBTAINED AND EVALUATED PRIOR TO ACQUISITION.

e. Contractor supplied chemicals shall be subject to the detail of the site chemical approved procedure.

2.3 CHEMICAL APPROVAL AND HAZARD EVALUATION

Control and tracking of new or sample chemicals includes the following elements.

a. Application to all new and sample chemicals.

b. Evaluation of environmental, health, and safety aspects of all new chemicals to ensure that they can be transported, received, used, stored, and disposed of safely, in accordance with applicable local and country laws and regulations as well as Digital and GIA Policies and Standards.

c. Identification of any extraordinary requirements and/or costs of use, employee protection, disposal, and associated costs of doing business.

d. Evaluation of changes of use, such as significant variation in volumes, changes in process, and so forth.

Hazard evaluation of new or sample chemicals includes the following elements.

a. The details of the process must be documented.

b. This review may rely on data such as MSDSs supplied by the manufacturer or supplier, and/or on a documented in-house evaluation procedure using other available data or resources.

c. A standard form shall be used that details the intended use of the chemical and records the input of each review participant.

d. Each chemical is to be evaluated for potential adverse short-term and long-term health effects and physical hazards.

e. Determine additional requirements for use, such as but not limited to, industrial hygiene monitoring, medical surveillance, biomonitoring, personal protective equipment, specific training, and engineering controls for potential process emissions.

f. Ensure that Health Services has a copy of each MSDS and is equipped to respond to possible medical emergencies prior to the introduction of the chemical into the plant.

g. All production and nonproduction chemicals, as well as samples obtained on a no-cost basis, must be procured through Purchasing using a purchase order. Chemicals shall not be procured using a miscellaneous procurement voucher through petty cash.

h. All chemicals, including samples, must be brought into the facility through a properly designated and protected receiving area.

i. Specific chemical safety training must be developed and presented to affected employees before the introduction of a new hazard into the plant.

2.4 MATERIAL SAFETY DATA SHEETS (MSDS)

Prior to the introduction of a new chemical on-site, requisitioners or users are responsible for obtaining MSDSs for new chemicals being introduced onto the site and their submission for review with details of the proposed use.

MSDSs must be readily available to employees and contractor employees.

A complete original hard copy of each MSDS file must be kept in a central location.

A complete duplicate hard copy file or electronic representation shall be kept in other locations identified as requiring such information, including Health Services, chemical receiving, and Security.

A work area specific duplicate hard copy or electronic representations shall be present and available in each work area.

Trade Secret Provisions:

Materials supplied under this provision shall only be accepted if there is sufficient data on the MSDS or equivalent information to make an evaluation that the material can be transported, received, used, stored, and disposed of in a safe and controlled manner.

Should it be necessary, additional data must be available from the manufacturer or supplier in nonemergency and emergency situations to a health care professional and/or a treating physician.

2.5 LABELS AND OTHER FORMS OF WARNING

A consistent labeling system shall be used throughout the site.

Containers shall have their contents identified.

a. Chemicals in any containers (that is, or moving through drums, large and small bottles, tanks, piping, and cylinders) entering the site shall be labeled with the identity (chemical and trade name), appropriate hazard warnings, and the name and address of the manufacturer or supplier.

b. Warnings may be words, pictures, or symbols that convey the nature of the hazard.

c. Labels must be legible.

Transfer containers shall be labelled. The containers include the following.

a. Portable transfer containers for immediate use.

b. Convenient use containers (for example, squeeze bottles, push-downs, flasks, beakers, and so forth).

Process and utility piping must have their contents identified.

2.6 EMPLOYEE INFORMATION AND TRAINING

Training shall be presented to all affected employees. It shall include the following elements in detail.

a. The existence of Digital, GIA, and applicable country and local Employee R-T-K standards and/or regulations.

b. Site program implementation procedures, how to read and understand MSDSs, how employees can obtain and use available hazard information, and who employees can contact with questions.

c. Specific hazard training for operations in their work area where hazardous chemicals are used, the physical and health hazards involved, and the necessary control, safety, work practice, and personal protective measures.

d. Location and availability of the written R-T-K program and associated documentation, such as MSDSs.

e. Procedure for obtaining and maintaining MSDSs.

f. Methods and observations that employees can use to detect the presence of a hazardous chemical to which they may be exposed.

Generic training shall include the following elements.

a. Appropriate when there is a wide variety of chemicals in use.

b. Address chemicals as groups (for example, acids, caustics, solvents, and so forth) instead of individually.

c. Specific training must then be administered by the department management and/or supervision.

Presentation detail shall include the following elements.

a. Format to be used may include classroom presentation with discussion, video, and quizzes.

b. How the trainer will be determined to be qualified.

c. How and where the permanent training attendance records will be maintained for employees and contractor employees such as, in employee personnel records, EH&S files, and department training files.

The frequency of training shall be:

a. Upon initial assignment to an area

b. When a new chemical and/or hazard is introduced

c. Annually, thereafter

2.7 ACCESS TO PROGRAM INFORMATION

Affected employees and their designated representatives, upon request, shall have access to the following:

a. Written R-T-K program

b. MSDSs

Appropriate community and governmental authorities shall have the following access to program information.

a. Review regulations to determine the identity of the appropriate authorities.

b. Chemical information, MSDSs, and/or information as required by applicable regulations.

2.8 WORKPLACE NOTICES

The minimum postings shall be:

a. Employee rights under Digital and GIA policy, as well as applicable country and local regulations

b. Company obligation to train if there is a job requirement to handle or potentially be exposed to hazardous chemicals

c. The availability and location(s) of MSDSs and the right to request information contained in the MSDS

APPENDIX A REFERENCED DOCUMENTS

A.1 Other Documents

Document Number	Document Title
	Toxic and Hazardous Substances, 29 CFR Part 1910, Subpart Z
	Threshold Limit Values (TLVs) for Chemical Substances and Physical Agents in the Work Environment
	Annual Reports on Carcinogens, U.S. National Toxicology Program (NTP)
	Monographs, International Agency for Research on Cancer (IARC)
	Hazardous Products Act, Revised Statutes of Canada 1985, C.24

For further information about these documents, contact the appropriate GIA EH&S group.

APPENDIX B RELATED DOCUMENTS

B.1 EL-Class Digital Documents

EL-Class Number	Document Title
EL-00136-01	*DEC STD 136-1 Digital Policy on Government-Regulated Materials in Digital's Manufacturing Processes*

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